## REMARKS/ARGUMENTS

Claim 1 of the present application claims:

A system for generating and storing one or more prepaid electronic vouchers comprising:

a voucher host system adapted to generate said prepaid electronic vouchers;

a voucher smart card;

a voucher terminal adapted to receive said prepaid electronic vouchers from said voucher host system over a network connection and to store said prepaid electronic vouchers in said voucher smart card; and

wherein said voucher terminal comprises a communication device comprising a subscriber identification module (SIM) card slot, a smart card reader/writer module electrically connected to said SIM card slot and wherein said smart card reader/writer module is adapted to receive and read/write information from/to said voucher smart card, respectively.

The attached diagram is a schematic representation of the voucher terminal and the voucher smart card of the system according to claim 1.

The Examiner rejected independent claim 1 under 35 U.S.C. 102(e) as being anticipated by Nakamura et al. (US Patent Application Publication U.S. 2004/0093309). The Examiner argued that Nakamura discloses an apparatus, system and method for electronic ticket management and electronic ticket distribution authentication. The Examiner further argued that Nakamura's system includes the following elements:

A. A ticket database server (111) for managing data concerning electronic tickets which the Examiner considered to be analogous to the Voucher host system of this invention.

B. A non-contact IC card (1000) as an example of the information storage chip, which the Examiner considered analogous to the voucher smart card of this invention.

C. An electronic ticket issuer (202) in cooperation with an electronic ticket seller (130), which can be a store terminal (150) and which the Examiner considered to be analogous to the Voucher terminal of this invention.

After careful examination of the Examiner's arguments and the cited patent application by Nakamura et al., we find the following differentiations of claim 1.

The voucher terminal of this invention includes a smart card reader/writer and a communication device that has a subscriber identification module (SIM) card slot. The smart card reader/writer is electrically connected to the SIM card slot of the communication device. The smart card reader/writer is adapted to receive and read/write information from/to the voucher card, respectively. See claim 1 and attached schematic drawing of the voucher terminal configuration according to claim 1.

Nakamura does not suggest a voucher terminal that includes a communication device and a card reader/writer and where the card reader/writer is connected to a SIM card slot of the communication device. This particular connection mechanism of the card reader/writer to the SIM card slot of the communication device is unique to the voucher terminal of claim 1.

According to the Examiner's argument "the reader has a function for reading the ID number of the user and the electronic ticket information form the information storage chip",( i.e., the voucher smart card). " if the information storage device (i.e., the voucher card) is a contact IC card, a card reader provided with a card entrance slot and a card exit slot is provided. The writer writes new electronic ticket information into the information storage chip of the user who is permitted to buy a ticket by the authentication unit. This argument does not suggest that the voucher terminal includes a communications device and a card reader that connects to a SIM card slot of the communication device.

The Examiner further argues that "the network may be a wireless or wired network". Again this argument does not suggest that the voucher terminal includes a

communication device and a card reader that connects to a SIM card slot of the communication device.

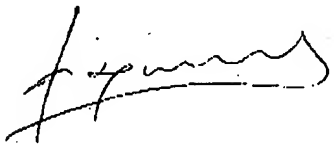
Neither Nakamura nor any of the other cited prior art documents suggest either alone or in combination this type of a voucher terminal that includes a card reader/writer and a communication device and where the card reader/writer is connected to a SIM card slot of the communication device. This particular voucher terminal configuration has the following two advantages: a) universality in the connectivity of the card reader/writer by connecting it to the SIM card slot, rather than to a parallel or serial port of the communication device; and b) secure authentication through the SIM card module of the communication device.

The same arguments are valid for independent claim 22. Accordingly, it is believed that independent claims 1 and 22 are patentably distinguishable from Nakamura et al., or any of the cited prior art documents taken alone or in combination. Claims 2-6 and 8-21 depend upon claim 1 and claims 23-32, 34-36, and 38-44 depend upon claim 22. Since claims 1 and 22 are distinguishable from the cited prior art they should also be distinguishable from the cited prior art.

In view of the above, it is submitted that all claims are in condition for allowance. Reconsideration of the rejections and objections is requested and allowance of all claims at an early date is solicited.

If this response is found to be incomplete, or if a telephone conference would otherwise be helpful, please call the undersigned at 617-558-5389

Respectfully submitted,



Aliki K. Collins, Ph.D.

Reg. No. 43,558

AKC Patents, 215 Grove Street, Newton, MA 02466

TEL: 617-558-5389, FAX: 617-332-0371

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Name: Aliki K. Collins, Ph.D. Signature _____

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